

201-15654



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

SEP 09 2004

Ms. Sharronn E. Etter  
Directory, Regulatory Affairs and Product  
Safety  
Wacker Chemical Corporation  
3301 Sutton Road  
Adrian, Michigan 49221-9397

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Dear Ms. Etter:

Thank you for your letter dated July 12, 2004 to the U.S. Environmental Protection Agency (EPA) regarding the EPA's High Production Volume (HPV) Challenge Program.

Your letter requests that EPA remove Silane, dichloro(chloromethyl)methyl (CAS No. 1558-33-4) from the HPV Challenge Program Chemical List.

As you know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its Chemical Right-to-Know (ChemRTK) website ([www.epa.gov/chemrtk](http://www.epa.gov/chemrtk)) in March 1999. Among the prerequisites to be considered for removing a chemical from the HPV Challenge Program is that the chemical does not meet Inventory Update Rule (IUR) reporting requirements for the two most recent reporting years, in this case 1998 and 2002. Our review of relevant IUR data indicates that Silane, dichloro(chloromethyl)methyl (CAS No. 1558-33-4) was reported in 1998 in amounts equal to or greater than the 1 million pounds per year threshold. Therefore, EPA has determined that this chemical **does not meet** the no longer HPV criteria.

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at [tscs-hotline@epa.gov](mailto:tscs-hotline@epa.gov).

Sincerely,

Wardner G. Penberthy  
Acting Director  
Chemical Control Division

cc: AR201